

REMARKS

Reconsideration of this application, as amended, is earnestly requested.

No claims are amended in this request for reconsideration.

Claims 1, 3-6, 8, and 16-23 are all the claims pending in the application, claims 2, 7, 9-15, and 24-34 having previously been canceled. Claims 1, 5, and 8 are the only independent claims remaining.

Claims 1, 3-6, 8 and 16-23 are rejected under §103(a) as being unpatentable over Shimamura et al. (US 6,808,773) in view of Watanabe (WO 03/040782, US 2004/0076835) and Kamiya et al. (WO 02/066570, US 2004/0076768). Applicant respectfully traverses these rejections, and requests reconsideration and allowance of the pending claims in view of the following arguments.

Shinamura relates to a shielding base member for shielding from electromagnetic radiation that leaks from a Plasma Display Panel. Shinamura teaches a transparent substrate, a first adhesive layer formed on the transparent substrate, a resin layer formed on the first adhesive layer, a metal layer pattern formed on the resin layer, and a reflection preventing layer formed on the metal layer pattern via a third adhesive layer. The first adhesive layer is in direct contact with the transparent substrate, the resin layer is in direct contact with the first adhesive layer, and the metal layer pattern is in direct contact with the resin layer.

As shown in Fig. 5, as referenced by the Examiner, the black frame 22 is formed on a glass substrate 10, and a transparent adhesive 12c is then applied to both the glass substrate 10 and the black frame 22. The Examiner has indicated that Shimamura does not teach "the region defined by the black adhesive corresponds to an active display area of the plasma display panel" (see, OA, p.3). In independent claims 1, 5, and 8, the black adhesive corresponds to a frame surrounding the active display area. Instead, the Examiner relies upon Watanabe to teach this feature.

Watanabe also relates to a display apparatus comprising an antireflection substance such as an antireflection film or an antireflection substrate on its display surface, as well as the antireflection substance. Watanabe teaches a frame-shaped black print layer 33 deposited on a plastic substrate 32, wherein the plastic substrate 32 is affixed to an antireflection film 11A with an adhesive layer 34. See, paragraph 0071 and Fig. 6.

Applicant respectfully disagrees; Watanabe's black frame is not a black adhesive but instead is printed on the plastic substrate 32. Watanabe does not teach "the region defined by the black adhesive corresponds to an active display area of the plasma display panel" of claims 1, 5, and 8. Watanabe teaches a black print layer, not black adhesive, deposited on the plastic substrate 34 to frame the active display area. Watanabe and Shinamura, either alone or in combination, does not teach "the region defined by the black adhesive corresponds to an active display area of the plasma display panel." Watanabe's black frame is not a black adhesive.

Instead, the Examiner relies upon Kamiya to teach this feature. Kamiya relates to a double-faced tape suitable for fixing a liquid crystal display panel and a backlight module together.

Applicant believes that the Examiner has not made a prima facie case for obviousness under 103. As recited in MPEP 2143, "the key to supporting any rejection under 35 U.S.C. 103 is clear articulation of the reason(s) why the claimed invention would have been obvious," referencing the Supreme Court in *KSR v. Teleflex*, 82 USPQ2d, 1385. In the present rejection, the Examiner states on p. 3 of the Office Action, "It would have been obvious to one of ordinary skill in the art at the time of the invention was made to replace the black frame portion of Simamura with the black adhesive frame of Kamiya to provide an effective screen frame while providing better adhesion between layers." Applicant respectfully disagrees.

Each of Shinamura and Watanabe describe a plasma display panel in which a black frame is placed on a substrate by a portion of the manufacturing process. In

Shinamura, "the black frame layer 22 is formed on one side of the glass substrate 10 ... and the copper layer pattern 16a is formed on the black frame layer 22 and the glass substrate 10 via a first adhesive layer 12c and the resin layer 14" (col. 12: 53-58). While not being specific how the black frame was formed, Shinamura does state it is formed as a layer implying that it is formed as part of the manufacturing process. Watanabe states the frame is a "print layer" (paragraph 0071).

Kamiya describes a black adhesive tape to fix a back light to an LCD panel. This is not the same as a black adhesive formed around the display area. The process to apply black adhesive tape maybe incompatible with the automated process used in manufacturing a plasma display panel, and while Kamiya and Shinamura both have frames defining an active view area, Shinamura's plasma display panel cannot be combined with Kamiya's black adhesive tape.

Further, an object of manufacturing a plasma display panel is to produce as thin a panel as possible. An indication of the dimensions involved is evident when Shinamura recites the dimension of the metal foil (for electromagnetic radiation shielding) is 10 μ m (col. 1: 65). Kamiya does not indicate any dimension for its tape, but it is evident from the layered construction that the tape is thicker than 10 μ m, and this teaches away from a thinner plasma display panel. A disadvantage of the prior art is any combination that produces a thicker plasma display panel. See, application paragraph 0030.

In MPEP 2143(A), one way to demonstrate obviousness is that combining prior art elements according to known methods yield predictable results. Here, the Examiner has not recited that Kamiya's tape when combined in the manufacture of a plasma display panel stack would produce the result that Shinamura's plasma display panel could be manufactured in a known way, or that Shinamura's plasma display panel made with Kamiya's tape would not be a thicker plasma display panel.

In MPEP 2143(B), another way to show obviousness is to substitute one known element for another to obtain predictable results. For the reasons described above, Kamiya's tape cannot be substituted for Shinamura's black frame layer.

The Examiner could also point to some teaching, suggestion, or motivation in the prior art to lead one of ordinary skill in the art to combine the references to achieve the claimed invention (MPEP 2143(G)). There is no teaching, suggestion, or motivation in either Shinamura or Watanabe to replace a formed or printed layer on a substrate with a double sided adhesive tape as described by Kamiya, and Kamiya is silent on using its double sided adhesive tape as a way to affix one layer to another layer of a plasma display panel. Taken together and with the object of producing a thin plasma display panel, Kamiya teaches away from substituting its double sided adhesive tape for a frame layer.

However, absent a clear articulation of the reasons by the claimed invention would have been obvious, applicant believes that a *prima facie* case for obviousness has not presented, and that absent a *prima facie* case for obviousness, claims 1, 5, and 8 are allowable as are all claims dependent thereon.

In view of the above remarks, applicant respectfully requests reconsideration and withdrawal of the rejections, and an early indication of the allowance of the claims. Applicant believes the claims are in a condition for allowance and respectfully solicit favorable action.

CONCLUSION

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain at issue which the Examiner feels may be best resolved through a telephone interview, the Examiner is kindly invited to contact the undersigned at (213) 623-2221.

Respectfully submitted,
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By: _____



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